

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

LA UNIÓN DEL PUEBLO ENTERO, *et al.*,  
*Plaintiffs*,

v.

GREGORY W. ABBOTT, *et al.*,  
*Defendants*.

OCA-GREATER HOUSTON, *et al.*,  
*Plaintiffs*,

v.

JOSE A. ESPARZA, *et al.*,  
*Defendants*.

HOUSTON JUSTICE, *et al.*,  
*Plaintiffs*,

v.

GREGORY WAYNE ABBOTT, *et al.*,  
*Defendants*.

LULAC TEXAS, *et al.*,  
*Plaintiffs*,

v.

JOSE ESPARZA, *et al.*,  
*Defendants*.

MI FAMILIA VOTA, *et al.*,  
*Plaintiffs*,

v.

GREG ABBOTT, *et al.*,  
*Defendants*.

Case No. 5:21-cv-844-XR

Case No. 1:21-cv-780-XR

Case No. 5:21-cv-848-XR

Case No. 1:21-cv-0786-XR

Case No. 5:21-cv-0920-XR

**STATE DEFENDANTS' INITIAL DISCLOSURES**

**TO: The LUPE Plaintiffs, by and through their attorney of record, Nina Perales, Mexican American Legal Defense and Education Fund, 110 Broadway, Suite 300, San Antonio, TX 78205; The OCA-Greater Houston Plaintiffs, by and through their attorney of record, Ryan V. Cox, Texas Civil Rights Project, 1405 Montopolis Drive, Austin, TX 78741; The Houston Justice Plaintiffs, by and through their attorney of record, Sarah M. Cummings, Reed Smith LLP, 2850 N. Harwood Street, Suite 1500, Dallas, TX 75201; The LULAC Plaintiffs, by and through their attorney of record, John R. Hardin, Perkins Coie LLP, 500 North Akard Street, Suite 3300, Dallas, Texas 75201-3347; and The Mi Familia Vota Plaintiffs, by and through their counsel of record, Sean Lyons, Lyons & Lyons, P.C., 237 W. Travis Street, Suite 100, San Antonio, Texas 78205.**

Texas Governor Greg Abbott, Secretary of State John Scott, and Attorney General Ken Paxton, each in his official capacity, (collectively, “State Defendants”) hereby submit the following initial disclosures in accordance with Rule 26(a)(1) of the Federal Rule of Civil Procedure. The State Defendants provide these disclosures subject to pending motions to dismiss and do not concede the viability of any claim against any State Defendant. Nor does any State Defendant waive any protections provided by the attorney work product protection, attorney-client privilege, or any other applicable privilege, protection, doctrine, or immunity. The State Defendants reserve the right to supplement these Initial Disclosures as additional discovery, investigation, and analysis may warrant. The State Defendants likewise do not waive the right to object, on any and all grounds, to (1) the evidentiary use of the information contained in these Disclosures; or (2) discovery requests relating to these Disclosures.

### **INITIAL DISCLOSURES**

**I. The name and, if known, the address and telephone number of each individual likely to have discoverable information – along with the subjects of that information – that the disclosing party may use to support his or her claims or defenses, unless the use would be solely for impeachment.**

**A. Legislative Authors and Sponsors**

The following state Representatives and Senators are authors, co-authors, sponsors, or co-sponsors of S.B. 1 or the three predecessor bills. These are (1) An Act Relating to Election

Integrity, H.B. 6, 87th Leg., Reg. Sess. (2021), (2) An Act Relating to Elections, S.B. 7, 87th Leg., Reg. Sess. (2021), and (3) Tex. Leg., An Act Relating to Election Integrity and Security, S.B. 1, 87th Leg., 1st Spec. Sess. (2021). The Legislative Authors and Sponsors may have discoverable information on the legislative process related to the passage of S.B. 1.

1. Senator Bryan Hughes.

110 N. College Ave., Ste. 207  
Tyler, Texas 75702

2. Senator Paul Bettencourt.

11451 Katy Freeway, Suite 209  
Houston, TX 77079

3. Senator Brian Birdwell.

900 Austin Avenue, Suite 500  
Waco, TX 76701

4. Senator Dawn Buckingham.

4400 Buffalo Gap Road  
Suite 0400  
Abilene, Texas 79606

5. Senator Donna Campbell.

229 Hunters Village, Ste. 105  
New Braunfels, TX 78132

6. Senator Brandon Creighton.

350 Pine Street, Suite 1450  
Beaumont, Texas 77701

7. Senator Bob Hall.

Alliance Building #2  
6537 Horizon Road, Suite B-1  
Rockwall, Texas 75032

8. Senator Joan Huffman.

2900 Weslayan Street, Suite 500

Houston, TX 77027

9. Senator Lois Kolkhorst.

2000 S. Market St. #101  
Brenham, TX 77833

10. Senator Jane Nelson.

1225 S. Main Street, Suite 100  
Grapevine, TX 76051

11. Senator Robert Nichols.

329 Neches Street  
Jacksonville, TX 75766

12. Senator Angela Paxton.

604 S. Watters Road, Suite 100  
Allen, TX 75013

13. Senator Charles Perry.

11003 Quaker Avenue, #101  
Lubbock, TX 79424

14. Senator Charles Schwertner.

3000 Briarcrest Drive  
Suite 202  
Bryan, TX 77802

15. Senator Drew Springer.

100 Austin Ave.  
Suite 103  
Weatherford, TX 76086

16. Senator Larry Taylor.

6117 Broadway, Suite 122  
Pearland, TX 77581

17. Representative Andrew Murr.

507 Earl Garrett Street  
Kerrville, Texas 78028

18. Representative J.M. Lozano.

1512 Wildcat Dr. Suite 100  
Portland, Texas 78374

19. Representative Travis Clardy.

202 East Pilar, Room 310  
Nacogdoches, Texas 75961

20. Representative James White.

205 N. Charlton Street  
Woodville, Texas 75979

21. Representative Jacey Jetton.

1108 Soldiers Field Dr., Suite 100  
Sugarland, Texas 77479

22. Representative Steve Allison.

1635 NE Loop 410, Suite 506  
San Antonio, Texas 78209

23. Representative Charles Anderson.

900 Austin Ave., Suite 804  
Waco, Texas 76701

24. Representative Trent Ashby.

2915 Atkinson Dr.  
Lufkin, Texas 75901

25. Representative Ernest Bailes.

10501 Hwy 150, Suite B  
Shepherd, Texas 77371

26. Representative Cecil Bell.

18230 FM 1488, Ste. 302  
Magnolia, Texas 77354

27. Representative Keith Bell.

100 E. Corsicana St., Suite 204

Athens, Texas 75751

28. Representative Kyle Biedermann.  
616 W. Main St., Suite 101, 101A, 102  
Fredericksburg, Texas 78624
29. Representative Greg Bonnen.  
174 Calder Rd., Ste. 116  
League City, Texas 77573
30. Representative Brad Buckley.  
1301 North Stagecoach Road  
Salado, Texas 76571
31. Representative DeWayne Burns.  
115 S. Main Street, Suite 202  
Cleburne, Texas 76033
32. Representative Dustin Burrows.  
10507 Quaker Avenue, Suite 103  
Lubbock, Texas 79424
33. Representative Angie Chen Button.  
1201 International Pkwy # 130  
Richardson, TX 75081
34. Representative Briscoe Cain.  
606 Rollingbrook Drive Suite 1E  
Baytown, TX 77521
35. Representative Giovanni Capriglione.  
1100 Bear Creek Parkway  
Keller, Texas 76248
36. Representative Jeff Cason.  
1600 Airport Fwy, Suite 370  
Bedford, Texas 76022
37. Representative David Cook.

309 E. Broad Street  
Mansfield, Texas 76063

38. Representative John Cyrier.

1017 Main St.  
Bastrop, Texas 78602

39. Representative Drew Darby.

36 W. Beauregard Suite 517  
San Angelo, Texas 76903

40. Representative Jay Dean.

101 E. Methvin, Suite 103  
Longview, Texas 75601

41. Representative Jake Ellzey.

2340 Interstate 20 W., Suite 224  
Arlington, Texas 76017

42. Representative James Frank.

1206 Hatton Rd.  
Wichita Falls, Texas 76302

43. Representative John Frullo.

5717 66th St., Suite 116–117  
Lubbock, Texas 79424

44. Representative Craig Goldman.

4521 South Hulen Street, Suite 208  
Fort Worth, TX 76109

45. Representative Sam Harless.

6630 Cypresswood Dr., Suite 150  
Spring, Texas 77379

46. Representative Cody Harris.

214 E. Elm St.  
Hillsboro, TX 76645

47. Representative Cole Hefner.

115 W. 1st Street  
Mount Pleasant, TX 75455

48. Representative Justin Holland.

101 E. Rusk St., # 201  
Rockwall, Texas 75087

49. Representative Dan Huberty.

4501 Magnolia Cove Dr. #201  
Kingwood, TX 77345

50. Representative Kyle Kacal.

3000 Briarcrest Dr., Suite 203,  
Bryan, TX 77802

51. Representative Phil King.

Nan and Bob Kingsley Building  
1710 Martin Drive  
Weatherford, TX 76086

52. Representative Stephanie Klick.

6851 NE Loop 820, Suite 230  
North Richland Hills, TX 76180

53. Representative Matt Krause.

1949 Golden Heights Rd., Suite 106  
Fort Worth, Texas 76177

54. Representative John Kuempel.

200 N. River Street, #100-E  
Seguin, Texas 78155

55. Representative Stan Lambert.

547 Chestnut  
Abilene, Texas 79602

56. Representative Brooks Landgraf.

119 W. 4th St., Suite 206  
Odessa, Texas 79761

57. Representative Jeff Leach.

550 S. Watters Road  
Suite 280  
Allen, TX 75013

58. Representative Ben Leman.

401 South Austin Street  
Brenham, Texas 77833

59. Representative Will Metcalf.

1835 Spirit of Texas Way, Suite 100  
Conroe, TX 77301

60. Representative Morgan Meyer.

3131 McKinney Avenue #649  
Dallas, TX 75204

61. Representative Mays Middleton.

2101 Mechanic Street  
Suite 245  
Galveston, TX 77550

62. Representative Geanie Morrison.

1908 N. Laurent, Suite 500  
Victoria, Texas 77901

63. Representative Jim Murphy.

9525 Katy Freeway  
Suite 215  
Houston, Texas 77024

64. Representative Candy Noble.

206 North Murphy Road  
Murphy, Texas 75094

65. Representative Tom Oliverson.

12345 Jones Rd #221  
Houston, Texas 77070

66. Representative Chris Paddie.

102 West Houston St.  
Marshall, Texas 75670

67. Representative Tan Parker.

800 Parker Square, Suite 245  
Flower Mound, TX 75028

68. Representative Jared Patterson.

5533 FM 423, Suite 503  
Frisco, Texas 75034

69. Representative Dennis Paul.

17225 El Camino Real Blvd  
Suite 415  
Houston, TX

70. Representative Four Price.

Amarillo National Bank  
Plaza Two, Suite 506  
500 S. Taylor Street  
Amarillo, Texas 79101

71. Representative John Raney.

4103 South Texas Avenue, Suite 103  
Bryan, Texas 77802

72. Representative Glenn Rogers.

600 E Depot Street  
Brownwood, TX 76801

73. Representative Scott Sanford.

115 West Virginia Street, Suite #103  
McKinney, TX 75069

74. Representative Matt Schaefer.

200 E. Ferguson St., Suite 506  
Tyler, TX 75702

75. Representative Matt Shaheen.

P.O. Box 2910  
Austin, TX 78768-2910

76. Representative Hugh Shine.

4 South 1st  
Temple, TX 76501

77. Representative Bryan Slaton.

P.O. Box 2910  
Austin, TX 78768

78. Representative Shelby Slawson.

PO Box 286  
Stephenville, TX 76401

79. Representative Reggie Smith.

421 N. Crockett St.  
Sherman, Texas 75090

80. Representative John Smithee.

320 S. Polk, 1st Floor  
Amarillo, Texas 79101

81. Representative David Spiller.

P.O. Box 447  
Jacksboro, TX 76458  
(512) 463-0526

82. Representative Phil Stephenson.

834 Third St.  
Rosenberg, Texas 77471

83. Representative Lynn Stucky.

400 West Oak Street, Suite 106  
Denton, Texas 76201

84. Representative Valoree Swanson.

23008 Northcrest Dr  
Spring, TX 77389

85. Representative Ed Thompson.

2341 N. Galveston Ave., Suite 120  
Pearland, Texas 77581

86. Representative Tony Tinderholt.

4381 W. Green Oaks Blvd. Ste. 107  
Arlington, Tx 76016

87. Representative Steve Toth.

25700 Interstate Hwy 45, Ste. 100  
Spring, TX 77386

88. Representative Gary VanDeaver.

710 James Bowie Drive  
New Boston, Texas 75570

89. Representative Cody Vasut.

222 N Velasco Street, Suite 25  
Angleton, TX 77515

90. Representative Terry Wilson.

710 Main Street  
Suite 242  
Georgetown, Texas 78626

## **B. Committee Members**

The following state Representatives and Senators were members of the Senate State Affairs Committee, the House Elections Committee, or the House Select Committee on Constitutional Rights and Remedies during the consideration of S.B. 1 and the three predecessor bills listed above. They may have discoverable information on the legislative process related to the passage of S.B. 1, and specifically on hearings conducted on those bills.

**1. Senate State Affairs Committee**

91. Chairman Bryan Hughes. Chairman Hughes is listed above.
92. Vice Chairman Brian Birdwell. Vice Chairman Birdwell is listed above.
93. Senator Donna Campbell. Senator Campbell is listed above.
94. Senator Bob Hall. Senator Hall is listed above.
95. Senator Eddie Lucio.

1324 E. Madison St.,  
Brownsville, TX 78520

96. Senator Jane Nelson. Senator Nelson is listed above.
97. Senator Beverly Powell.  
  
1612 Summit Avenue, Suite 101  
Fort Worth, TX 76102
98. Senator Charles Schwertner. Senator Schwertner is listed above.
99. Senator Judith Zaffirini.

1407 Washington Street  
Laredo, TX 78040

**2. House Select Committee on Constitutional Rights and Remedies**

100. Chairman Trent Ashby. Address listed above.
101. Vice Chairwoman Senfronia Thompson.  
  
10527 Homestead Road  
Houston, TX 77016
102. Representative John Bucy III.  
  
3016 Polar Lane Suite 108  
Cedar Park, Texas 78613
103. Representative Travis Clardy. Representative Clardy is listed above.
104. Representative Charlie Geren.  
  
6713 Telephone Rd Suite 301  
Lake Worth, TX 76135

105. Representative Jacey Jetton. Representative Jetton is listed above.

106. Representative Ann Johnson.

5601 West Loop S  
Suite C218  
Houston, Texas 77081

107. Representative Stephanie Klick. Representative Klick is listed above.

108. Representative Brooks Landgraf. Representative Landgraf is listed above.

109. Representative Oscar Longoria.

1320 S. Main St.  
Peñitas TX, 78576

110. Representative J.M. Lozano. Representative Lozano is listed above.

111. Representative Joe Moody.

7365 Remcon Circle C-301  
El Paso, Tx 79912

112. Representative Mat Shaheen. Representative Shaheen is listed above.

113. Representative James White. Representative White is listed above.

### **3. House Elections Committee**

114. Chairman Briscoe Cain. Chairman Cain is listed above.

115. Vice Chairwoman Jessica Gonzalez.

400 South Zang Blvd., Suite 1214  
Dallas, Texas 75208

116. Representative Michelle Beckley.

3740 N Josey Lane, Suite 136  
Carrollton, TX 75007

117. Representative John Bucy III. Representative Bucy is listed above.

118. Representative Travis Clardy. Representative Clardy is listed above.

119. Representative Art Fierro.

1790 Lee Trevino Dr.

Suite 307  
El Paso, Texas 79936

120. Representative Jacey Jetton. Representative Jetton is listed above.

121. Representative Mike Schofield.

1550 Foxlake Drive  
Suite 120,  
Houston, TX 77084

122. Representative Valerie Swanson. Representative Swanson is listed above.

**C. Committee Hearings Witnesses**

Lists of the witnesses who testified on S.B. 1 are included in the legislative history compilations that are part of the document production accompanying these disclosures. *See* Part II.A. That list is incorporated herein. These persons may have discoverable information that relates to the claims and defenses at issue in this litigation, particularly as pertains to the reasons that members of the public expressed support or opposition to the legislation. The State Defendants do not have contact information for these persons at this time.

**D. Plaintiffs**

In addition to the specific parties and subjects identified below, the State Defendants hereby incorporate by reference those individuals and entities identified by the plaintiffs in their Rule 26(a)(1) Initial Disclosures.

**1. Individual Plaintiffs**

The following persons are plaintiffs in this case and have knowledge regarding the allegations set forth in their live pleading. They may be contacted through their counsel of record.

123. Jeffrey Lamar Clemons.

124. Isabel Longoria.

125. James Lewin.

126. Marla López.

127. Marlon López.

128. Paul Rutledge.

## **2. Entity Plaintiffs**

The following entities are plaintiffs in this case and have knowledge regarding the allegations set forth in Plaintiffs' live pleading. Moreover, all unidentified members, supporters, clients, and constituents of the Entity Plaintiffs, as well as all the unidentified members of Entity Plaintiffs' leadership, may have discoverable information that relates to the claims and defenses at issue in this litigation, particularly as it pertains to standing and any disability-based claim. Each Entity Plaintiff may be contacted through their counsel of record.

129. La Unión Del Pueblo Entero.

130. Friendship-West Baptist Church.

131. Anti-Defamation League Austin, Southwest, and Texoma Regions.

132. Southwest Voter Registration Education Project.

133. Texas Impact.

134. Mexican American Bar Association of Texas.

135. Texas Hispanics Organized for Political Education.

136. Jolt Action.

137. William C. Velasquez Institute.

138. FIEL.

139. LULAC Texas.

140. Voto Latino.

141. Texas Alliance for Retired Americans.

142. Texas AFT.

143. Mi Familia Vota.
144. OCA-Greater Houston.
145. League of Women Voters of Texas.
146. REVUP Texas.
147. Texas Organizing Project.
148. Workers Defense Action Fund.
149. Houston Justice.
150. Houston Area Urban League.
151. Delta Sigma Theta Sorority Inc.
152. The Arc of Texas.

**E. Defendants**

In addition to the specific parties and subjects identified below, the State Defendants hereby incorporate by reference those individuals and entities identified by the other defendants in their Rule 26(a)(1) Initial Disclosures.

The following persons are defendants in this case, in their official capacities as county election officials, and may have knowledge regarding the allegations set forth in Plaintiffs' live pleading. Each County Defendant may be contacted through their counsel of record.

153. Lupe C. Torres.
154. Jacque Callanen.
155. Isabel Longoria.
156. Dana DeBeauvoir.
157. Lisa Wise.
158. Michael Scarpello.
159. Yvonne Ramon.

**F. Individuals with Information Related to Claims Asserted Under the ADA, Rehabilitation Act, and Section 208 of the VRA**

Several Entity Plaintiffs and Individual Plaintiffs raise claims under the Americans with Disabilities Act (“ADA”), Rehabilitation Act, or Section 208 of the Voting Rights Act (“VRA”). To the extent that any of the Individual Plaintiffs or any of the members of Entity Plaintiffs have qualifying disabilities under the ADA or the Rehabilitation Act or require assistance voting by reason of blindness or disability under Section 208 of the VRA, those persons’ physicians have discoverable information on their patients’ disability or blindness and their treatment history. And to the extent that any of the Individual Plaintiffs or any of the members of Entity Plaintiffs require assistance voting because he or she is unable to read or write, those persons have discoverable information regarding educational records, and education history.

**G. Miscellaneous Other Individuals**

- 160. Jonathan White. Mr. White is the Chief of the Office of the Attorney General of Texas, Elections Integrity Division. He also testified before the Legislature during the consideration of S.B. 1. He may have discoverable information on the claims and defenses at issue in these cases. He may have information regarding election-related investigations and prosecutions, to the extent those materials are not privileged. Mr. White may be contacted through counsel of record for the State Defendants.
- 161. Keith Ingram. Mr. Ingram is the Director of the Office of the Texas Secretary of State, Elections Division. He also testified before the Legislature during the consideration of S.B. 1. He may have discoverable information on the claims and defenses at issue in these cases. Mr. Ingram may be contacted through counsel of record for the State Defendants.

The following persons may have discoverable information related to the claims and defenses at issue in these cases. And in addition to these individuals, there may be discoverable information related to the claims and defenses at issue in these cases in the possession of unnamed local election officials throughout the State of Texas, including but not limited to county clerks, county tax assessor-collectors, county election administrators, county commissioners, county

judges, the county chairs of political parties, city secretaries, any person acting as the early voting clerk, members of early voting ballot boards, members of signature verification committees, presiding judges, alternate presiding judges, election clerks, poll watchers, and district attorneys.

162. Chris Hollins. Mr. Hollins is the former Harris County Clerk. He may have discoverable information on voting practices related to S.B. 1. The State Defendants do not have contact information for Mr. Hollins.

**II. A copy – or a description by category and location – of all documents, electronically stored information, and tangible things that the disclosing party has in his or her possession, custody, or control and may use to support his or her claims or defenses, unless the use would be solely for impeachment.**

**A. Legislative History Compilations**

A compilation of legislative-history materials for S.B. 1 (2d Special Session), S.B. 1 (1st Special Session), S.B. 7 (Regular Session), and H.B. 6 (Regular Session) are appended to these disclosures. The materials are made publicly available by Texas Legislature Online, and are bookmarked to denote separate documents. The State Defendants specifically reserve the right to amend or supplement these disclosures as they identify additional documents, testimony, and legislation that relate to the passage of S.B. 1.

**B. Bill Analyses**

Bill analyses of S.B.1 and its predecessor bills including analyses of their impact on state operations. Documents relating to these assessments may be found in the possession, custody, and control of the State Defendants. The State Defendants reserve claims of privilege and any protections provided by the attorney work product protection, attorney-client privilege, or any other applicable privilege, protection, doctrine, or immunity related to these materials.

**C. Election Complaints**

Election complaints may be submitted to the Secretary of State. If, after receiving a complaint alleging criminal conduct in connection with an election, SOS determines that there is

reasonable cause to suspect that the alleged criminal conduct occurred, SOS shall refer the complaint to the Attorney General for further investigation and possible prosecution. Documents relating to these complaints may be found in the possession, custody, and control of the Secretary of State or Office of the Attorney General. The State Defendants reserve claims of privilege and any protections provided by the attorney work product protection, attorney-client privilege, or any other applicable privilege, protection, doctrine, or immunity related to these materials.

### **Revised Forms**

The Office of the Secretary of State has created or revised election-related forms, and is preparing other updated forms and related documents, in accordance with S.B. 1. Copies of these forms may be found in the possession, custody, and control of the Secretary of State. The State Defendants reserve claims of privilege and any protections provided by the attorney work product protection, attorney-client privilege, or any other applicable privilege, protection, doctrine, or immunity related to these materials.

### **D. Advisory Materials**

The Office of the Secretary of State has issued election advisories and other guidance materials, and given presentations, to election officials that summarized the election-related legislation enacted in 2021. Documents relating to these materials may be found in the possession, custody, and control of the Secretary of State. The State Defendants reserve claims of privilege and any protections provided by the attorney work product protection, attorney-client privilege, or any other applicable privilege, protection, doctrine, or immunity related to these materials.

### **III. A computation of each category of damages claimed by the disclosing party, who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material (unless privileged or protected from disclosure) on which each computation is based, including materials bearing on the nature and extent of injuries suffered.**

Not applicable.

**IV. For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.**

Not applicable.

Date: November 5, 2021

KEN PAXTON  
Attorney General of Texas

BRENT WEBSTER  
First Assistant Attorney General

Respectfully submitted.

Patrick K. Sweeten  
PATRICK K. SWEETEN  
Deputy Attorney General for Special Litigation  
Tex. State Bar No. 00798537

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Tex. State Bar No. 24118415  
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**COUNSEL FOR DEFENDANT**

**CERTIFICATE OF SERVICE**

I certify that a true and accurate copy of the foregoing document was emailed to all counsel of record on November 5, 2021, and that counsel consented to be served by email.

*Patrick K. Sweeten*  
PATRICK K. SWEETEN